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Return Date:
March 24, 2020 (9:30 a.m.)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE,

Plaintiff,

—against—

1:18-cv-05436-AKH-DF

**HALSTEAD PROPERTY, LLC,
HALSTEAD MANHATTAN, LLC and
AYO HAYNES,**

Defendants.

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**NOTICE OF MOTION
[SUMMARY JUDGMENT]
[corrected]**

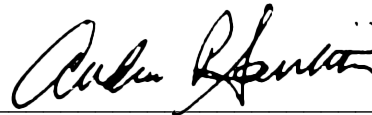
Defendants Halstead Manhattan, LLC (formerly known as Halstead Property, LLC) and Ayo Haynes, by their attorneys the Law Offices of Andrew P. Saulitis P.C., pursuant to Fed. R. Civ. P. 56 and S.D.N.Y. Local Civil Rules 6.1, 7.1 and 56.1, moves the Court for an order granting summary judgment dismissing the complaint on the grounds that there is no genuine dispute as to any material fact and the defendants-movants are entitled to judgment as a matter of law in this discrimination case under the Fair Housing Act, in the plaintiff

was unable to buy a condominium apartment because the owner sold it to someone who bid more for it than plaintiff did, not because of any discrimination by the seller's brokers, who duly communicated all bids, including plaintiff's.¹

This motion is supported by the accompanying declaration of Andrew P. Saulitis dated February 14, 2020 and its exhibits, the declaration of Ayo Haynes dated February 17, 2020 and their exhibits, defendants' statement of material facts pursuant to Fed. R. Civ. P. 56 (c) (1) and Local Civil Rule 56.1 (a) and (d) and memorandum of law dated February 14, 2020.

In accordance with the Court's Minute Entry dated January 10, 2020 for proceedings held before Judge Alvin K. Hellerstein, opposing papers are due by March 13, 2020 and reply papers are due by March 23, 2020.

Dated: February 14, 2020



Andrew P. Saulitis

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VIA ECF TO:

¹"Jane Doe" ("Ms. Doe") is a pseudonym under which plaintiff, "an African American homosexual woman" brings this action, though there is no compelling reason for her to do so, or to continue to do so.

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